1 [Submitting Counsel Listed on Signature Page] 2 3 UNITED STATES DISTRICT COURT 4 NORTHERN DISTRICT OF CALIFORNIA 5 SAN FRANCISCO DIVISION 6 7 IN RE: UBER TECHNOLOGIES, INC., Case No. 3:23-md-03084-CRB PASSENGER SEXUAL ASSAULT 8 ADMINISTRATIVE MOTION TO LITIGATION **CONSIDER WHETHER ANOTHER** 9 PARTY'S MATERIAL SHALL BE **SEALED** This Document Relates to: 10 **ALL ACTIONS** Judge: Hon. Lisa J. Cisneros 11 Courtroom: G – 15th Floor 12 13 Under Civil Local Rules 7-11 and 79(f), Plaintiffs move the Court to consider whether 14 certain documents marked confidential by Uber should be sealed. 15 **Material To Be Filed Under Seal** 16 The document to be filed under seal are Plaintiffs' Letter Brief Re: Subpoena to the Chertoff 17 Group and Exhibit E thereto. Plaintiffs request the Court consider whether the following should be 18 19 filed under seal: 20 **Designating Party** Document **Description** 21 Exhibit E to Plaintiffs' Letter A document created by the Uber Brief Re: The Chertoff Group Chertoff Group designated 22 "Confidential" by Uber Plaintiffs' Letter Brief Re: The Plaintiffs' Letter Brief Uber 23 containing quotations to Chertoff Group Exhibit E which is a document 24 designated "Confidential" by 25 Uber 26 27 28

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	

28

Under Local Rule 79-5(f)(3), the Designating Party bears the responsibility to establish that all of the designated material is sealable and must "file a statement and/or declaration as described in subsection (c)(1)" of the Local Rules. None of the information was marked confidential by Plaintiffs.

This Motion complies with Civil Local Rule 7-11 and 79-5 and is accompanied by the following attachments:

- 1. The Declaration of Sarah London in Support of this Motion; and
- 2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: August 30, 2024 Respectfully submitted,

By: /s/ Marlene J. Goldenberg

Marlene J. Goldenberg Samantha V. Hoefs

NIGH GOLDENBERG RASO & VAUGHN PLLC

14 Ridge Square NW, Third Floor

Washington, D.C. 20016 Telephone: (202) 978-2228 Facsimile: (202) 792-7927

mgoldenberg@nighgoldenberg.com shoefs@nighgoldenberg.com

By: /s/ Sarah R. London

Sarah R. London (SBN 267083)

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

275 Battery Street, 29th Floor San Francisco, CA 94111-3339 Telephone: (415) 956-1000 Facsimile: (415) 956-1008 slondon@lchb.com

By: /s/ Rachel B. Abrams

Rachel B. Abrams (SBN 209316)

PEIFFER WOLF CARR KANE CONWAY & WISE, LLP

555 Montgomery Street, Suite 820

San Francisco, CA 94111 Telephone: (415) 426-5641 Facsimile: (415) 840-9435 rabrams@peifferwolf.com

By: /s/ Roopal P. Luhana

Roopal P. Luhana

2

1	CHAFFIN LUHANA LLP 600 Third Avenue, 12th Floor
2	New York, NY 10016 Telephone: (888) 480-1123
3	Facsimile: (888) 499-1123 luhana@chaffinluhana.com
4	Counsel for Plaintiffs
5	Counsel for I tunings
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	3

CERTIFICATE OF SERVICE I hereby certify that on August 30, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record. Dated: August 30, 2024 Respectfully submitted, By: /s/ Marlene J. Goldenberg Marlene J. Goldenberg NIGH GOLDENBERG RASO & VAUGHN PLLC 14 Ridge Square NW, Third Floor Washington, D.C. 20016 Telephone: (202) 978-2228 Facsimile: (202) 792-7927 mgoldenberg@nighgoldenberg.com